

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AVRAHAM GOLDSTEIN; MICHAEL
GOLDSTEIN; FRIMETTE KASS-
SHRAIBMAN; MITCHELL LANGBERT;
JEFFREY LAX; MARIA PAGANO.,

Plaintiffs,

-against-

PROFESSIONAL STAFF CONGRESS/CUNY,
CITY UNIVERSITY OF NEW YORK; JOHN
WIRENIUS, in his official capacity as
Chairperson of the New York Public Employee
Relations Board; ROSEMARY A. TOWNLEY,
in her official capacity as Member of the New
York Public Employee Relations Board;
ANTHONY ZUMBOLO, in his official capacity
as Member of the New York Public Employee
Relations Board; CITY OF NEW YORK;
THOMAS P. DINAPOLI, in his official capacity
as New York State Comptroller,,

Defendants.

**PROPOSED RULE 68
JUDGMENT**

1:22-cv-00321 (PAE)

WHEREAS, Plaintiff Avraham Goldstein has alleged against defendants violations of 42 U.S.C. § 1983 and the First and Fourteenth Amendments to the United States Constitution;

WHEREAS, pursuant to Rule 68 of the Federal Rules of Civil Procedure, Plaintiff Goldstein has accepted Defendant City of New York's Offer of Judgment, dated on April 22, 2022, taking judgment against the City of New York in the above-captioned action ("this action") in the amount of two hundred and twenty-three dollars and thirty-five cents (\$223.35), plus reasonable attorneys' fees, expenses, and costs accrued to date, for all claims that have been, or could have

been asserted in the complaint by Plaintiff Avraham Goldstein in the above-captioned matter, to the date of this offer;

WHEREAS, this judgment shall be in full satisfaction of all federal and state law claims or rights that Plaintiff Goldstein may have to damages, or any other form of relief, arising out of the alleged acts or omissions of Defendant City of New York, in connection with the facts and circumstances that are the subject of the complaint in this action and is not to be construed as an admission of liability by Defendant City of New York or any official, employee, or agent of the City of New York, or any agency nor is it an admission that Plaintiff Goldstein has suffered any damages;

WHEREAS, this judgment also will operate to waive Plaintiff Goldstein's rights to any claim for interest on the amount of the judgment and will act to release and discharge Defendant City of New York, their successors or assigns, and all past and present officials, employees, representatives and agents of the City of New York or any agency thereof, from any and all claims that were or could have been alleged by plaintiff in the above-captioned action;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, that pursuant to Rule 68 of the Federal Rules of Civil Procedure, Plaintiff Goldstein takes judgment against Defendant City of New York in this action in the amount of two hundred and twenty-three dollars and thirty-five cents (\$223.35), plus reasonable attorneys' fees, expenses, and costs in an amount to be determined by the Court.

Dated: _____

Paul A. Engelmayer, United States District Judge